

LITE DEPALMA GREENBERG, LLC

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Attorneys for Plaintiffs and the Classes

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

EDWARD SCHWARTZ, on behalf of himself
and others similarly situated,

Plaintiff,

vs.

AVIS RENT A CAR SYSTEM, LLC, and
AVIS BUDGET GROUP, INC.,

Defendants.

Civil Action No. 11-4052 (JLL) (JAD)

DANIEL KLEIN and STEPHANIE KLEIN,
on behalf of themselves and others similarly
situated,

Plaintiffs,

vs.

BUDGET RENT A CAR SYSTEM, INC. and
AVIS BUDGET GROUP, INC.,

Defendants.

Civil Action No. 12-7300 (JLL) (JAD)

**PLAINTIFFS' NOTICE OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT,
FOR INCENTIVE AWARDS TO NAMED
PLAINTIFFS, AND FOR AN AWARD OF
ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES**

PLEASE TAKE NOTICE that on May 25, 2016, at 10:00 a.m., a date and time
previously selected by the Court (see ECF No. 180), or soon thereafter as counsel may be heard,
plaintiffs will move before Hon. Jose L. Linares, U.S.D.J., at the U.S. District Court, M.L. King,

Jr. Federal Building & Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for the entry of an Order:

- (1) finally certifying settlement classes with respect to the claims against defendants pursuant to Fed. R. Civ. P. 23(a) and 23(b)(3);
- (2) finally approving the proposed Settlement;
- (3) making incentive awards to the class representatives; and
- (4) awarding attorneys' fees and reimbursement of expenses to Plaintiffs' Counsel..

In support of that portion of plaintiffs' motion that relates to settlement class certification and settlement approval, plaintiffs will rely upon the accompanying Memorandum of Law and Declaration of Bruce D. Greenberg with exhibits. In support of that portion of plaintiffs' motion that relates to an award of attorneys' fees and reimbursement of expenses, and incentive awards to the class representatives, plaintiffs will rely upon the accompanying documents and on a Memorandum of Law and accompanying papers to be submitted not later than May 20, 2016, pursuant to this Court's prior Order (see ECF No. 180). A proposed form of Order is submitted herewith.

Plaintiffs respectfully request oral argument on May 25, 2016.

Dated: May 2, 2016

LITE DEPALMA GREENBERG, LLC

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Attorneys for Plaintiffs and the Classes

CERTIFICATE OF SERVICE

I, Bruce D. Greenberg, hereby certify that on May 2, 2016, I caused a copy of (a) Notice of Plaintiffs' Unopposed Motion For Preliminary Approval of Class Action Settlement; (b) Memorandum of Law in Support of Plaintiff's Unopposed Motion For Preliminary Approval of Class Action Settlement; and (c) Declaration of Bruce Greenberg with Exhibits, to be served upon all counsel of record through the Court's ECF system.

/s/ Bruce D. Greenberg
Bruce D. Greenberg